



**Assistive Technology
Resource Centers of Hawaii**

Linking People with Assistive Technology

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January 18, 2001

ATRC: 2000105

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1-18-01

Magalie Salas
Office of the Secretary
FCC
445 12th St SW,
Wash DC 20554

Docket Nos., CC 98-67 AND CC 90-571
in response to Public Notice DA#00-2739

Dear Ms. Salas:

We strongly agree with Dr. Bob Segalman's filing regarding the NECA budget. Dr. Segalman proposes establishing an annual \$6m Speech to Speech (STS) budget. This would ensure adequate usage of STS especially in the many states, which would otherwise have no STS outreach budget. The disability community in Hawaii would not be able to secure such funding at this time. Federal support is needed.

Sincerely,

Barbara Fishlowitz-Leong
Executive Director

c: Senator Daniel Inouye
Senator Daniel Akaka
Representative Neil Abercrombie
Representative Patsy Mink

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Reference: CC Docket 98-67

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Reading the recent proposed NECA reimbursement rates for Speech to Speech (STS) both intra-state and inter-state causes serious concern because such rates do not take outreach costs into consideration. The TRS regulations for STS require providers to make outreach efforts. These efforts should come from such reimbursed funds. I strongly encourage NECA's recommended reimbursements to be restructured to cover the outreach costs required by the regulations.

STS Outreach Efforts

Only the few states listed below have made significant Speech to Speech (STS) outreach efforts and made their costs available to me. My recent personal poll of state relay administrators for STS call volume data suggests that no other states are making significant STS outreach efforts.

Costs for STS Outreach

Current costs for STS Outreach for Minnesota are \$120,000 per year. California STS outreach costs appears to be about \$100,000 per year. Minnesota's per capita expenditures appear much more adequate than California's as Minnesota's program structure enables its staff to reach many more isolated consumers than California's does. People with speech disabilities (PSDs) frequently have other disabilities that limit their transportation options. Thus, Minnesota's STS outreach service (which is budgeted to enable outreach staff to visit potential STS users in their homes) appears much more successful in its effort to reach isolated potential STS users than California's service does.

Minnesota is the only state that has an STS outreach structure that takes in to account the social and psychological nature of the PSD population in planning and budgeting for STS outreach. Such budgeting would not be appropriate for TTY users as they have different social and psychological characteristics.

Maryland's STS outreach efforts are integrated into its overall outreach budget so that STS outreach costs cannot be determined. Washington State has a part time STS outreach worker and my guess is that the cost is less than \$30,000 per year. Wisconsin's STS outreach is too recent for costs to be made available.

Suggested Annual National Expenditures for STS Outreach

Because Minnesota appears to have the most adequate STS outreach service, I strongly recommend that budget structure be applied nationally. As Minnesota represents about 2 percent of the nations population this would mean that about \$6m should be spent nationally on STS outreach.

Conclusion

Given the regulatory requirements for providers to insure that STS outreach is carried out and the appropriateness of the Minnesota expenditure model for STS Outreach, I strongly recommend that the NECA reimbursement structure be recomputed; an additional \$6m should budgeted that providers will spend nationally on STS outreach.

Bob Segalman, Ph.D.
Founder of Speech-to-Speech
California Department of Rehabilitation
Attention: Program Evaluation
2000 Evergreen Street
Sacramento, CA 95815

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Assistive Technology Resource Centers of Hawaii (ATRC)

WHAT IS A SPEECH-TO-SPEECH RELAY SERVICE AND WHY IS IT NEEDED?

Speech-to-Speech Relay enables a person with a speech disorder who cannot normally communicate by telephone, to use a telephone and his or her own voice, voice synthesizer, voice enhancer, or electro larynx. Telephone relay operators who have received special training to understand non-standard speech repeat the words spoken by a person with a speech disability, thus enabling them to carry on telephone conversations with people who would otherwise be unable to understand what was said. Speech-to-Speech Relay Service is similar to the Telecommunications Relay Services for TTY users.

Speech-to-Speech (STS) is currently available in twelve states. New Federal Communications Commission regulations require all states to provide STS by March 1, 2001.

Many people with speech disabilities use the TTY Relay to make phone calls, but there are many others who do not have the manual dexterity to effectively use a TTY during a telephone calls. Individuals with Cerebral Palsy, Multiple Sclerosis, Muscular Dystrophy, Parkinson's, and those who have experienced traumatic brain injury or a stroke can greatly benefit from STS. In Hawaii, 11,000 people have speech disabilities that make it difficult or impossible for them to participate in conversation with others. Approximately 3,000 individuals have associated mobility limitations that prevent them from effectively using TTYs for telephone communication.¹

Society today is very dependent on the telephone as a primary form of communication. Individuals with speech disabilities and dexterity impairments do not have access to this very critical type of communication. Speech-to-Speech, with direct and speedy telephone access, brings into the mainstream those with a speech or communication disorder who may be able to find employment for the first time, simply because they are able to use the telephone. It also allows new freedom to make independent social transactions as well because STS permits independent, private telephone communication.

¹ Information provided by State of Hawaii Disability and Communication Access Board and Robert Segalman, Ph.D., founder of the Speech-to-Speech Relay Service.